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8 Attorneys for Cross-Defendant
9 CHURCH OF SCIENTOLOGY OF CALIFORNIA

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

11	CHURCH OF SCIENTOLOGY)	No. C 420 153
12	OF CALIFORNIA, a)	
13	California corporation,)	RESPONSES OF CROSS-DEFENDANT
14	Plaintiff,)	CHURCH OF SCIENTOLOGY OF
15	vs.)	CALIFORNIA TO REQUEST FOR
16	GERALD ARMSTRONG,)	PRODUCTION OF DOCUMENTS
17	Defendant.)	PROPOUNDED BY CROSS-COMPLAINANT
18		GERALD ARMSTRONG
19		
20	GERALD ARMSTRONG,)	
21	Cross-complainant,)	
22	vs.)	
23	CHURCH OF SCIENTOLOGY)	
24	OF CALIFORNIA, et al.,)	
25	Cross-defendants.)	

26 Defendant Church of Scientology of California responds to
27 the request for production of documents by cross-complainant,
28 Gerald Armstrong, as follows:

RESPONSE TO REQUEST NO. 1: Objection. The documents sought
are covered by the priest-penitent privilege, Evidence Code

EXHIBIT E

1 Sections 1033 and 1034. Additionally, the request seeks to
2 interfere in the internal affairs of a religious organization,
3 thus the documents sought are protected by the First Amendment;
4 and because these files contain personal notes and observations
5 of ministers of the Church, their disclosure would constitute an
6 invasion of privacy.

7 2. RESPONSE TO REQUEST NO. 2:

8 Objection. The information requested is protected by the
9 attorney work-product doctrine and the attorney-client privilege.

10 3. RESPONSE TO REQUEST NO. 3:

11 Objection. The information requested is protected by the
12 attorney work-product doctrine and the attorney-client privilege.

13 4. RESPONSE TO REQUEST NO. 4:

14 Objection. This request is vague, ambiguous and overbroad
15 in that "mission orders" is not defined and there is no time
16 period specified in the request. However, without waiving these
17 objections, cross-defendant has searched its records, files,
18 archives and storage areas, and has located no such documents.

19 5. RESPONSE TO REQUEST NO. 5:

20 Objection. This request is vague, ambiguous, irrelevant
21 and not calculated to lead to the discovery of admissible evi-
22 dence. The term "mission orders" is not defined and information
23 relating to Howard Schomer has no bearing on any claims or
24 defenses in this case. However, without waiving these objections,
25 cross-defendant has searched its records, files, archives and
26 storage areas, and has located no such documents.

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1 6. RESPONSE TO REQUEST NO. 6:

2 Objection. This request is overbroad and to a large
3 extent requests material which seeks to invade the internal
4 workings of a religious organization which is protected by
5 the First Amendment and seeks information protected by the
6 attorney-client privilege and the attorney work-product
7 doctrine.

8 7. RESPONSE TO REQUEST NO. 7:

9 Objection. This request is overbroad and to a large
10 extent requests material which seeks to invade the internal
11 workings of a religious organization which is protected by
12 the First Amendment and seeks information protected by the
13 attorney-client privilege and the attorney work-product
14 doctrine.

15 8. RESPONSE TO REQUEST NO. 8:

16 Objection. This request is vague, ambiguous, overbroad
17 and burdensome in that it does not specify a time period, and
18 does not specify which Church of Scientology or which publica-
19 tions are requested. However, without waiving the above objec-
20 tions, cross-defendant is in the process of conducting an exhaus-
21 tive search of its files. No such documents have yet been located.
22 If such documents are located, they will promptly be provided to
23 attorney for cross-complainant.

24 9. RESPONSE TO REQUEST NO. 9:

25 Objection. This request is vague, ambiguous, overbroad
26 and burdensome in that it does not specify a time period, and
27 does not specify which Church of Scientology or which publica-
28 tions are requested. However, without waiving the above objec-

1 tions, cross-defendant is in the process of conducting an exhaus-
2 tive search of its files. No such documents have yet been
3 located. If such documents are located, they will promptly be
4 provided to the attorney for cross-complainant.

5 10. RESPONSE TO REQUEST NO. 10:

6 Objection. This request is vague, ambiguous, overbroad
7 and burdensome in that it does not specify a time period, and
8 does not specify which Church of Scientology or which publica-
9 tions are requested. However, without waiving these objections,
10 cross-defendant is in the process of conducting an exhaustive
11 search of its files. No such documents have yet been located.
12 If such documents are located, they will promptly be provided
13 to the attorney for cross-complainant.

14 11. RESPONSE TO REQUEST NO. 11:

15 Objection. This request seeks information protected by
16 the attorney work-product doctrine.

17 12. RESPONSE TO REQUEST NO. 12:

18 Objection. This request seeks information protected by
19 the attorney work-product doctrine and attorney-client privilege,
20 and seeks information not calculated to lead to the discovery of
21 admissible evidence.

22 13. RESPONSE TO REQUEST NO. 13:

23 Objection. This request is vague, ambiguous, overbroad,
24 burdensome and seeks information not calculated to lead to the
25 discovery of admissible evidence. In addition, the request
26 violates the attorney work-product rule and the attorney-client
27 privilege.

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EXHIBIT E

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14. RESPONSE TO REQUEST NO. 14:

This information is being compiled and will be provided to the attorney for cross-complainant for inspection and copying.

15. RESPONSE TO REQUEST NO. 15:

This information is being compiled and will be provided to the attorney for cross-complainant for inspection and copying.

Dated: August 23, 1984

Law Offices of
PETERSON AND BRYNAN

By: John G. Peterson
JOHN G. PETERSON

Attorney for Cross-
Defendant Church of
Scientology of California

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF

I have read the foregoing RESPONSES OF CROSS-DEFENDANT CHURCH OF SCIENTOLOGY OF CALIFORNIA TO REQUEST FOR PRODUCTION OF DOCUMENTS and know its contents.

CHECK APPLICABLE PARAGRAPH

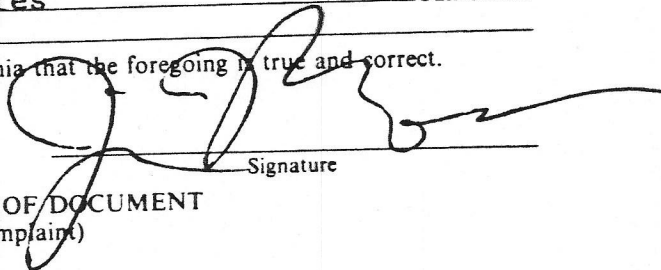
I am a party to this action. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am an Officer a partner _____ a _____ of Church of Scientology of California

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I have read the foregoing document and know its contents. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am one of the attorneys for _____ a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I have read the foregoing document and know its contents. I am informed and believe and on that ground allege that the matters stated in it are true. Executed on August 23, 1984, at Los Angeles California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.


Signature

ACKNOWLEDGMENT OF RECEIPT OF DOCUMENT
(other than summons and complaint)

Received copy of document described as _____
on _____ 19 _____

Signature

PROOF OF SERVICE BY MAIL

STATE OF CALIFORNIA, COUNTY OF

Los Angeles

State of California.

I am employed in the county of _____ I am over the age of 18 and not a party to the within action; my business address is: 8530 Wilshire Blvd. Suite 407, Beverly Hills, California 90012

On August 23 1984 I served the foregoing document described as Responses of Cross-Defendant Church of Scientology of California to Request for Production of Documents Propounded by Cross-Complainant Gerald Armstrong on cross-complainant

in this action by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States mail at: Los Angeles

addressed as follows:

Ms. Julia Dragojevic
Contos & Bunch
5855 Topanga Canyon Boulevard
Suite 400
Woodland Hills, California
91367

(BY MAIL) I caused such envelope with postage thereon fully prepaid to be placed in the United States mail at Los Angeles, California.

(BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the offices of the addressee. Executed on _____, 19____ at _____, California.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
 (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.


Signature